



Biometric Data – Policy

Including all of the Pre-Prep Department and Early Years Foundation Stage

DJJK

Updated October 2022

Review and Amendment Record

Date	Person Conducting the Review	Changes Made
1 Jan 2017	Ops Dir	New policy in support of new biometric registration
22 Mar 2018	Ops Dir	Review in relation to GDPR
10 May 2018	Ops Dir	Review in relation to GDPR
01 Oct 2018	Ops Dir	Review
01 Oct 2019	Ops Dir	Annual Review
01 Oct 2020	Ops Dir	Annual Review
01 Oct 2021	Ops Dir	Annual Review
01 Oct 2022	Bursar	Annual Review

PUPIL BIOMETRIC INFORMATION POLICY

1. At Summer Fields we strive to make the lives of our pupils easier by enabling quick and easy registration and security access control.
2. To this end, as a school, we collect, store and process pupils' biometric data via fingerprint scanning for the purpose of registration and security access.
3. Summer Fields takes the collection and storage of all pupil data very seriously, and abides by the principles of The Data Protection Act 1998 and The Protection of Freedoms Act 2012. We store all pupil biometric data securely for the purposes of identification only. Pupil biometric data is only processed for the purposes for which it was obtained, and which have been notified to pupils' parents or legal guardians, and it is not unlawfully disclosed to third parties.
4. In accordance with The Protection of Freedoms Act 2012, Summer Fields notifies every pupil's parents and/or legal guardian(s) of its practice of collecting and processing pupils' biometric data as part of an automated biometric recognition system, and obtains written parental consent to that use from at least one parent or legal guardian. Parents may withdraw their consent in writing at any time. Pupils may also opt out of the use of their own biometric information at any time.
5. Notification sent to parents and/or legal guardians informs them fully of Summer Field's reasons for collecting and processing pupils' biometric data and includes full details of the biometric data to be collected, its intended use, and parents' and pupils' right to opt out of the school's biometric recognition system. Those who opt out will be provided with details of alternative arrangements.
6. The automated recognition software which Summer Fields uses for the purposes of processing biometric data turns the pupil's fingerprint into a mathematical algorithm. The image of the fingerprint itself is then deleted meaning that the information which is stored cannot be used to recreate the original image of the fingerprint [or insert equivalent applicable to the type of biometric information collected.
7. Pupil biometric data will be deleted when the pupil leaves the school, or if for some other reason they cease to use the biometric system.
8. If parents or pupils have any questions about the school's collection and use of biometric information, they are welcome to contact the school's nominated data protection lead, the Bursar.

Template Notification and Consent Form

9. Summer Fields uses the Independent Schools Bursars Association templates for informing parents and for securing parental consent for the collection and storage of biometric data. Provided at Appendix 1.

Appendix

1. Notification of Intention to Process Pupils' Biometric Information.

References:

- A. Department for Education's 'Protection of Biometric Information of Children in Schools':
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/268649/biometrics_advice_revised_12_12_2012.pdf
- B. ICO Guide to Data Protection for Organisations:
http://www.ico.gov.uk/for_organisations/data_protection/the_guide.aspx
- C. ICO Guidance on Data Protection for Education Establishments:
http://www.ico.gov.uk/for_organisations/sector_guides/education.aspx

Circulation for comment and input:

Deputy Headmaster, IT Network Manager, School Secretary, PA to Deputy Heads

Publication: Policy Drive

Appendix 1 - NOTIFICATION OF INTENTION TO PROCESS PUPILS' BIOMETRIC INFORMATION

Dear Parent / Carer / Guardian

The school wishes to use information about your child as part of an automated finger recognition registration system. This will allow pupils to register at school on entrance to the school building and at lunch time. The information from your child that we wish to use is referred to as 'biometric information' (see next paragraph). Under the Protection of Freedoms Act 2012 (sections 26 to 28), we are required to notify each parent of a child and obtain the written consent of at least one parent before being able to use a child's biometric information for an automated system.

Biometric information is information about a person's physical or behavioural characteristics that can be used to identify them, for example and in this case information from their fingerprint. The school would like to take and use information from your child's fingerprint and use this information for the purpose of school registration and security access.

The information will be used as part of an automated biometric recognition system. This system will take measurements of your child's fingerprint and convert these measurements into a template to be stored on the system. An image of your child's fingerprint is not stored. The template (i.e. measurements taken from your child's fingerprint is what will be used to permit your child to access services).

You should note that the law places specific requirements on schools when using personal information, such as biometric information, about pupils for the purposes of an automated biometric recognition system.

For example:

- (a) the school cannot use the information for any purpose other than those for which it was originally obtained and made known to the parent(s) (i.e. as stated above);
- (b) the school must ensure that the information is stored securely;
- (c) the school must tell you what it intends to do with the information;
- (d) unless the law allows it, the school cannot disclose personal information to another person/body –you should note that Synel may have need of access to the database, on specific occasions related to technical support, but the templates are not shared routinely with Synel and information is stored locally on site.

Providing your consent/objecting

As stated above, in order to be able to use your child's biometric information, the written consent of at least one parent is required. However, consent given by one parent will be over-ridden if the other parent objects in writing to the use of their child's biometric information. Similarly, if your child objects to this, the school cannot collect or use their biometric information for inclusion on the automated recognition system.

You can also object to the proposed processing of your child's biometric information at a later stage or withdraw any consent you have previously given. This means that, if you give consent but later change your mind, you can withdraw this consent. Please note that any consent, withdrawal of consent or objection from a parent must be in writing.

Even if you have consented, your child can object or refuse at any time to their biometric information being taken/used. His objection does not need to be in writing. We would appreciate it if you could discuss this with your child and explain to them that they can object to this if they wish.

Summer Fields is also happy to answer any questions you or your child may have.

If you do not wish your child's biometric information to be processed by the school, or your child objects to such processing, the law says that we must provide reasonable alternative arrangements for children who are not going to use the automated system for school registration and security access.

If you give consent to the processing of your child's biometric information, please sign, date and return the enclosed consent form to the school.

Please note that when your child leaves the school, or if for some other reason he ceases to use the biometric system, his biometric data will be securely deleted.

Consent Form for the Use of Biometric Information in School

Please complete this form if you consent to the school taking and using information from your child's fingerprint by Summer Fields as part of an automated biometric recognition system. This biometric information will be used by Summer Fields for the purpose of school registration and security access.

In signing this form, you are authorising the school to use your child's biometric information for this purpose until he either leaves the school or ceases to use the system. If you wish to withdraw your consent at any time, this must be done so in writing and sent to the school at the following address:

School Secretary,
Summer Fields,
Mayfield Road,
Oxford,
OX2 7EN

Once your child ceases to use the biometric recognition system, his biometric information will be securely deleted by the school.

Having read guidance provided to me by Summer Fields, I give consent to information from the biometric fingerprint of my child:

Name of child _____

being taken and used by Summer Fields for use as part of an automated biometric recognition system for school registration and security access purposes for which this data will be used

I understand that I can withdraw this consent at any time in writing.

Name of Parent:

Signature:

Date:

Please return this form to: School Secretary, Summer Fields